

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SHORELINE AVIATION, INC.	:	Case No. <u>2:20-cv-02161-JMA-SIL</u>
	:	
Plaintiff,	:	
	:	
v.	:	<b>DECLARATION OF RYAN A.</b>
	:	<b>PILLA</b>
	:	
SOUND AIRCRAFT FLIGHT ENTERPRISE, INC.	:	
<i>et. al.</i>	:	
	:	
Defendants.	:	
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**RYAN A. PILLA**, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. I am a defendant in this action. The foregoing Declaration is based on my personal knowledge. I am submitting this declaration in connection with defendants Sound Aircraft Flight Enterprise, Inc., Cynthia L. Herbst, and Ryan A. Pilla (the “Herbst Defendants”) motion for summary judgment.

1. I have been dating defendant Cynthia L. Herbst for over six years.

2. During the time that I have been dating Ms. Herbst, I was not involved in the operations of her businesses whatsoever.

3. I have never accessed or received her intellectual property or proprietary business information, nor have I accessed or received the information related to the customers that she services.

4. I have never transferred to any party, Ms. Herbst’s businesses’ intellectual property customer information, or other proprietary business information.

5. I also never have accessed or received the intellectual property, customer information, or other proprietary business information of the entities that Ms. Herbst does business with, including Shoreline Aviation, Inc (“Shoreline”).

6. I have never transferred to any party, Shoreline’s intellectual property customer information, or other proprietary business information

7. In fact, I have no relationship or contracts with Shoreline whatsoever, and I have never agreed to keep information confidential on its behalf.

8. When Ms. Herbst executed a business deal with Blade Air Mobility, Inc. (“Blade”), Blade mistakenly copied me on correspondence and had mistakenly listed me as a principal of Sound Aircraft Flight Enterprises (“SAFE”) on certain documents. They had also surprisingly asked me to sign a non-compete even though I am not a principal of SAFE.

9. I did not sign any agreement with Blade because I have no interest or involvement with Ms. Herbst’s business ventures.

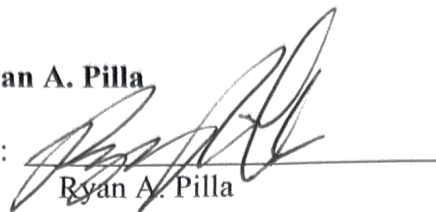
10. I did not receive any consideration from Ms. Herbst’s deal with Blade.

*I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my personal knowledge.*

Dated: June 16, 2023

**Ryan A. Pilla**

By:

A handwritten signature in black ink, appearing to read "Ryan A. Pilla", is written over a horizontal line. The signature is stylized with a large, looped "R" and "P".

Ryan A. Pilla